



DEVELOPMENT SERVICES DEPARTMENT  
 ENVIRONMENTAL COORDINATOR  
 450 110<sup>th</sup> Ave NE  
 BELLEVUE, WA 98009-9012

**DETERMINATION OF NON-SIGNIFICANCE**

**PROPONENT:** Mark Cross, City of Bellevue Utilities

**LOCATION OF PROPOSAL:** City-Wide

**DESCRIPTION OF PROPOSAL:** Programmatic SEPA review for public utility projects where pipes and appurtenances exceed eight inches in diameter within public right-of-way and/or an existing utility easement.

**FILE NUMBERS:** 14-126071-LM      **PLANNER:** Reilly Pittman

The Environmental Coordinator of the City of Bellevue has determined that this proposal does not have a probable significant adverse impact upon the environment. An Environmental Impact Statement (EIS) is not required under RCW 43.21C.030(2)(C). This decision was made after the Bellevue Environmental Coordinator reviewed the completed environmental checklist and information filed with the Land Use Division of the Development Services Department. This information is available to the public on request.

- There is no comment period for this DNS. There is a 14-day appeal period. Only persons who submitted written comments before the DNS was issued may appeal the decision. A written appeal must be filed in the City Clerk's office by 5:00 p.m. on \_\_\_\_\_.
- This DNS is issued after using the optional DNS process in WAC 197-11-355. There is no further comment period on the DNS. There is a 14-day appeal period. Only persons who submitted written comments before the DNS was issued may appeal the decision. A written appeal must be filed in the City Clerk's Office by 5 p.m. on **5/29/2014**
- This DNS is issued under WAC 197-11-340(2) and is subject to a 14-day comment period from the date below. Comments must be submitted by 5 p.m. on \_\_\_\_\_. This DNS is also subject to appeal. A written appeal must be filed in the City Clerk's Office by 5:00 p.m. on \_\_\_\_\_.

This DNS may be withdrawn at any time if the proposal is modified so as to have significant adverse environmental impacts; if there is significant new information indicating a proposals probable significant adverse environmental impacts (unless a non-exempt license has been issued if the proposal is a private project); or if the DNS was procured by misrepresentation or lack of material disclosure.

*[Signature]*  
 Environmental Coordinator

5/15/2014  
 Date

**OTHERS TO RECEIVE THIS DOCUMENT:**

- State Department of Fish and Wildlife / [Stewart.Reinbold@dfw.gov](mailto:Stewart.Reinbold@dfw.gov); [Christa.Heller@dfw.wa.gov](mailto:Christa.Heller@dfw.wa.gov);
- State Department of Ecology, Shoreline Planner N.W. Region / [Jobu461@ecy.wa.gov](mailto:Jobu461@ecy.wa.gov); [sepaunit@ecy.wa.gov](mailto:sepaunit@ecy.wa.gov)
- Army Corps of Engineers [Susan.M.Powell@nws02.usace.army.mil](mailto:Susan.M.Powell@nws02.usace.army.mil)
- Attorney General [ecyolyef@atg.wa.gov](mailto:ecyolyef@atg.wa.gov)
- Muckleshoot Indian Tribe [Karen.Walter@muckleshoot.nsn.us](mailto:Karen.Walter@muckleshoot.nsn.us); [Fisheries.fileroom@muckleshoot.nsn.us](mailto:Fisheries.fileroom@muckleshoot.nsn.us)



**City of Bellevue  
Development Services Department  
Land Use Staff Report**

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Proposal Name: **Programmatic SEPA for Utility Infrastructure to Exceed Eight Inches in Diameter**

Proposal Address: City of Bellevue – City-wide

Proposal Description: Programmatic SEPA review for public utility projects where pipes and appurtenances exceed eight inches in diameter within public right-of-way and/or an existing utility easement.

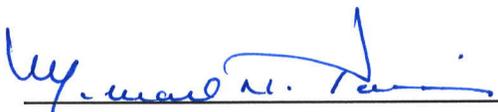
File Number: 14-126071-LM

Applicant: Mark Cross, City of Bellevue Utilities Department

Planner: Reilly Pittman, Land Use Planner

Decisions Included: SEPA Threshold Determination

State Environmental Policy Act  
Threshold Determination: **Determination of Non-Significance (DNS)**

  
\_\_\_\_\_  
**Carol V. Helland, Environmental Coordinator  
Development Services Department**

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Application Date: March 4, 2014  
Notice of Application Date: March 20, 2014  
Decision Publication Date: May 15, 2014  
Project Appeal Deadline: May 29, 2014 (14 days)

For information on how to appeal a proposal, visit the Permit Center at City Hall or call (425) 452-6864. Comments on State Environmental Policy Act (SEPA) Determinations can be made with or without appealing the proposal within the noted comment period for a SEPA Determination. Appeal of the Decision must be received in the City Clerk's Office by 5 PM on the date noted for appeal of the decision.

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### Attachments

1. Best Management Practices – Enclosed
2. SEPA Exemption or Programmatic Flowchart – Enclosed
3. Programmatic Notification Form – Enclosed

## I. **PROPOSAL DESCRIPTION, OBJECTIVES, & LIMITATIONS**

This programmatic SEPA review is for public utility infrastructure within the City of Bellevue where the proposed size of storm water, water, and sewer facilities, lines, equipment, hookups, or appurtenances will exceed eight inches in diameter and thus otherwise be subject to SEPA review. This review concerns any public project requiring utility infrastructure or relocation utilities, but is primarily focused on capital projects listed in the City of Bellevue Utility Department Capital Improvement Plan. All projects that are covered by this review are located in the public right-of-way or within an existing public easement across private property and do not require new right of way or an easement be obtained.

SEPA is required for utility systems and facilities projects when the project is not otherwise exempt—e.g. for repair and maintenance—and the proposed pipe size exceeds eight inches in diameter as specified at WAC 197-11-800(23)(b). Programmatic, non-project review is an appropriate option in certain circumstances to cover those installations where the eight-inch pipe diameter standard is the only factor that triggers SEPA review. The intent is to streamline required permitting by avoiding unnecessary environmental review, where increased pipe size has little measurable impact on the environment

A project covered by this review could include maintenance of aging systems, repair of failing systems, replacement of components that are reaching the end of their useful life, and enlargement of an existing system to handle additional capacity. Projects could also include the installation of new facilities or systems, with limitations, when necessary to respond to growth and demand on the system. The project could also be part of road improvement projects that include utilities. In any context, this programmatic review addresses the circumstance in which existing utilities are to be repaired, replaced, or newly installed in which the replacement pipe will exceed eight inches in diameter. The addition of a larger pipe size to a project under the repair and replacement exemption under WAC 197-11-800(3) will not, in most cases, constitute “material expansion.”

Utility projects may be exempt from SEPA, be covered by this programmatic review or have aspects that require separate SEPA review as part of the required permits. The following describes the possible SEPA process determined by the project scope.

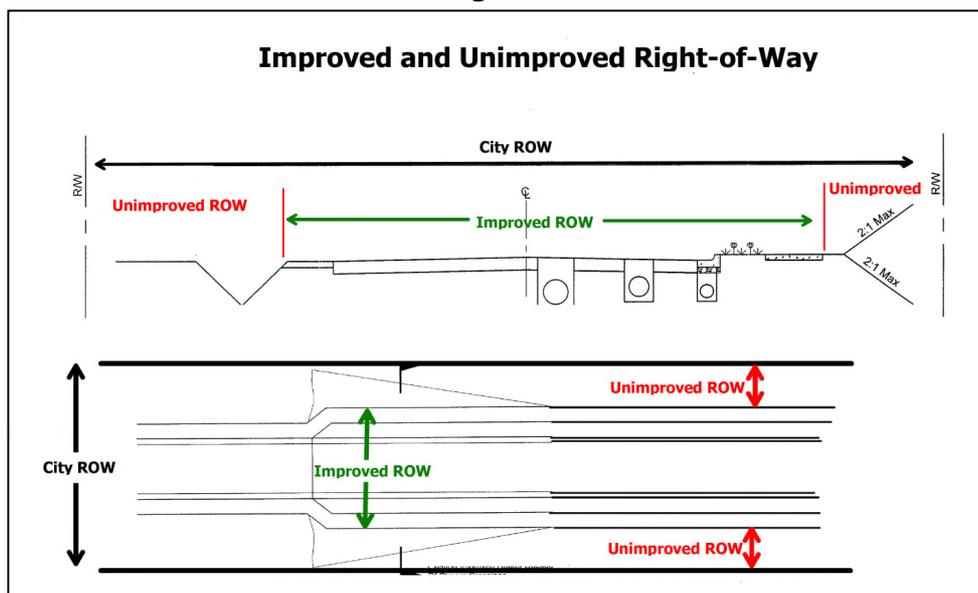
- The repair, remodeling, and maintenance of utilities, involving no material expansions or changes in use beyond that previously existing, is already exempt from SEPA review and is not covered by this programmatic approval. In lands covered by water, only minor repair or minor replacement is exempt from SEPA.
  - For clarification on what is meant by material expansion and minor repair, it is necessary to state that moderate increase pipe size is not considered a material expansion and can be minor repair. Typical utility construction has used a trenching method dug by a 24-inch wide backhoe. As a result, an existing pipe could be enlarged up to a 24-inch wide pipe and have no material expansion of impacts to sensitive areas beyond that already approved. In lands covered by water, pipe

replacement, including enlargement, is possible based on the examples in WAC 197-11-800(3) as a piling may be replaced with a larger diameter piling and considered minor repair. Given that the State is revising the minimum exemption for pipe size from eight to twelve inches reveals that the new base line for determining impacts is twelve inches not eight. Provided a pipe is buried beneath the surface, an increase in pipe size is considered a de minimus impact and is not considered to be a material expansion, provided all disturbance is contained within the right-of-way or easement.

- Lands covered by water include streams, lakes, ponds, and wetlands
- Projects that exceed other SEPA exemptions stated in WAC 197-11-800 or as amended by the City's Environmental Procedures Code 22.02 are not covered by this programmatic review. Large scale projects that consist of a series of actions such as projects to provide City-wide capacity or service that cumulatively may have an adverse environmental impact require separate SEPA review with required permits. Projects proposing a pipe size of 42 inches or greater may qualify under this programmatic SEPA provided the pipe is located within the improved right-of-way or easement
- Projects that replace existing system components to meet current engineering design standards or provide new increased capacity, exceeding eight inches in diameter, to meet demand as required in the City Comprehensive Plan are not exempt from SEPA and would be covered by this programmatic approval.

Therefore, projects covered by this programmatic SEPA determination may exceed minor repair and replacement, can be new services, and are not large projects that improve service city-wide. However, a project with potential to be covered by this review may still not qualify for coverage based on the characteristics of the individual project site/area. Public right-of-way and easements can be improved or unimproved as depicted below in figure 1.

Figure 1



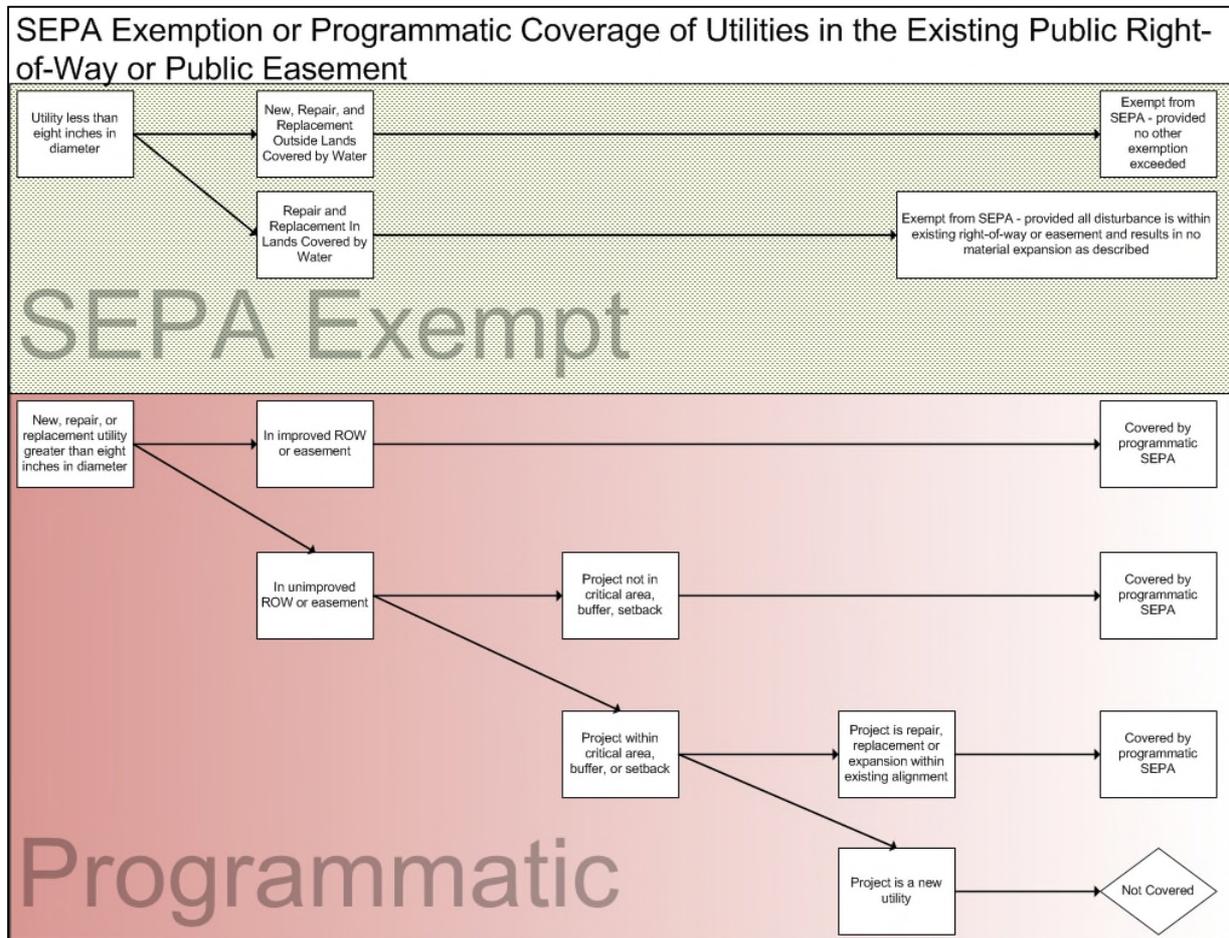
Improved typically means that surface is paved, has ornamental landscaping, or has a structure or other man-made improvements covering the ground. In some cases, unimproved right-of-way can include environmentally critical areas as described later in this report.

After the examination of SEPA applicability above, the following evaluation should be applied to each potential project to determine if the programmatic review can be used.

- The project is within improved public right of way or public easement and is covered by this programmatic review
- The project is within unimproved public right of way or public easement outside of critical areas, buffers, or setbacks and is covered by this programmatic review.
- Projects in unimproved public right of way or public easement and located in critical areas, buffers, or setbacks are limited to those actions characterized as repair, remodeling and maintenance under WAC 197-11-800(3) that may include the replacement of existing facilities with larger pipes and facilities and are covered by this programmatic SEPA if:
  - The enlarged utility line, replacing the existing, is placed in the same right-of-way or easement alignment and not in a new alignment, causing new disturbance (i.e. “in-place”).
  - All disturbances of the ground and vegetation on the surface are contained within the existing public right of way or easement corridor.
  - All projects are subject to the BMPs found as attachment 1 to this report.

Figure 2 (attachment 2) below depicts a flowchart showing what projects qualify for coverage under this programmatic SEPA. Based on the prior use of this approval, the potential projects were grouped together and submitted in a combined clearing and grading permit for review. This allows staff to ensure that the projects contained in the application are consistent with the limitations and requirements of this programmatic SEPA review. Each application will include a notification form found as attachment 3 of this report.

Figure 2



**II. SITE DESCRIPTION & CRITICAL AREAS**

**A. SITE DESCRIPTION**

All projects are proposed in either City of Bellevue right-of-way or public easement across private property which may or may not be located in critical areas.

**B. CRITICAL AREAS**

A utility project may be located in any critical areas stated in Land Use Code 20.25H which provide the functions and values described below.

**i. Streams and Riparian Areas**

Streams are classified into four types, based on their flow and capacity to support fish. Artificial channels (e.g., ditches) are generally not protected, unless they are used by salmonids or convey a stream that previously occurred naturally in that location.

Stream needs healthy riparian areas along its banks and floodplain. Riparian vegetation

provides shade, which protects water quality; retains soil, which prevents erosion that can affect salmon spawning and feeding areas; holds back flood flows; and provides wildlife habitat and the large woody debris that stores sediments, slows flood velocities, and creates good fish habitat.

## **ii. Shorelines**

Shorelines provide a variety of functions including shade, temperature control, water purification, woody debris recruitment, channel, bank and beach erosion, sediment delivery, and terrestrial-based food supply (Gregory et al. 1991; Naiman et al. 1993; Spence et al. 1996).

Shorelines provide a wide variety of functions related to aquatic and riparian habitat, flood control and water quality, economic resources, and recreation, among others. Each function is a product of physical, chemical, and biological processes at work within the overall landscape. In lakes, these processes take place within an integrated system (ecosystem) of coupled aquatic and riparian habitats (Schindler and Scheuerell 2002). Hence, it is important to have an ecosystem approach which incorporates an understanding of shoreline functions and values.

## **iii. Wetlands**

Wetlands include the vegetated edges of ponds and areas commonly called swamps, marshes, and bogs. Frequently, their water is only visible in the spring. Wetlands are classified into four categories, based on a combination of habitat, water quality, and flood-flow-reduction functions.

Wetlands provide rearing and foraging habitats for fish and wildlife and food chain support for downstream waters. Wetlands provide natural water quality improvement; flood-flow reduction and storage; shoreline erosion protection; and opportunities for passive recreation. Many urban wetlands are heavily disturbed, but still provide valuable water quality treatment and flood-flow reduction.

## **iv. Floodplains**

Flood hazard areas are those subject to 100-year floods (identified on FEMA Flood Insurance Rate Maps). These areas are designated to protect development from flooding and to protect the inherent functions of floodplains. Undeveloped floodplains store water and slow the downstream delivery of flood flows, reducing the impacts of a flood and recharging wetlands, streams and underground aquifers. Floodplain development reduces the floodplain's water storage capacity and puts valued property and infrastructure in the path of floodwaters. Runoff from impervious surfaces changes flood size and frequency and can degrade water quality.

## **v. Habitat Associated with Species of Local Importance**

Species of local importance are specifically recognized local populations of native species that are at risk of being lost from Bellevue—western pond turtle, Oregon spotted

frog, western toad, Chinook salmon, bull trout, coho salmon, river lamprey, bald eagle, peregrine falcon, common loon, pileated woodpecker, Vaux's swift, merlin, western grebe, great blue heron, osprey, green heron, red-tailed hawk, western big-eared bat, Keen's myotis (bat), long-legged myotis (bat), and long-eared myotis (bat)—and whose presence can be an indicator of environmental health.

Habitats for these species provide the food, water, nesting/rearing, and cover necessary to support their populations. Protected habitats include naturally occurring ponds under 20 acres, concentrations of dead trees, caves and roosting structures, and large stands of conifers.

#### **vi. Geologic Hazard Areas**

Geologic hazards pose a threat to the health and safety of citizens when commercial, residential, or industrial development is inappropriately sited in areas of significant hazard. Some geologic hazards can be reduced or mitigated by engineering, design, or modified construction practices. When technology cannot reduce risks to acceptable levels, building in geologically hazardous areas is best avoided (WAC 365-190).

Steep slopes may serve several other functions and possess other values for the City and its residents. Several of Bellevue's remaining large blocks of forest are located in steep slope areas, providing habitat for a variety of wildlife species and important linkages between habitat areas in the City. These steep slope areas also act as conduits for groundwater, which drains from hillsides to provide a water source for the City's wetlands and stream systems. Vegetated steep slopes also provide a visual amenity in the City, providing a "green" backdrop for urbanized areas enhancing property values and buffering urban development.

### **III. PUBLIC NOTICE & COMMENT**

Application Date:	March 4, 2014
Public Notice (500 feet):	March 20, 2014
Minimum Comment Period:	April 3, 2014

The Notice of Application for this project was published the City of Bellevue weekly permit bulletin and Seattle Times on March 20, 2014. No written comments were received.

### **IV. STATE ENVIRONMENTAL POLICY ACT (SEPA)**

The environmental review indicates no probability of significant adverse environmental impacts occurring as a result of the proposal. The Environmental Checklist submitted with the application adequately discloses expected environmental impacts associated with the project. The City codes and requirements, including the Clear and Grade Code, Utility Code, Land Use Code, Noise Ordinance, Building Code and other construction codes are expected to mitigate potential environmental impacts. Therefore, issuance of a

Determination of Non-Significance (DNS) is the appropriate threshold determination under the State Environmental Policy Act (SEPA) requirements.

The primary purpose of this programmatic SEPA is to address instances where an existing or new system or facility is proposed that is more than 8 inches in diameter. WAC 197-11-8(23)(b) exempts utility projects from SEPA review provided the pipe size does not exceed 8 inches in diameter.

#### **A. EARTH, AIR, AND WATER**

Bellevue's rainy season work restrictions will limit the possibility for detrimental erosion and sedimentation. A majority of the proposed projects will be within existing and improved right-of-way which will not result in significant risk for erosion and exposed soils. Projects will be grouped for review under a master Clearing and Grading permit reviewed by Land Use and Clearing and Grading staff, which may have requirements for sedimentation and erosion control plans and BMPs such as:

- Silt fencing
- Temporary sedimentation ponds
- Catch basin protection
- Covering slopes and materials to prevent erosion

Turbidity monitoring may be required for work in or near wetlands and streams, however to qualify under this approval utility repair and maintenance in wetland and streams must be bored, drilled, or installed using a similar technique which does not require trenching or open cuts. Where boring or drilling is done, the only areas for potential soil exposure are at the bore/drill entry and exit pits.

#### **B. ANIMALS AND PLANTS**

The project areas are within the public right-of-way or public easement on private property. However projects occur throughout the City which may be within or on the fringe of critical areas which can contain quality habitat for birds and mammals. The proposed activities are designed to be minimally invasive in regards to wildlife habitat as they are targeted to be within the improved right-of-way or easement. For a project to be covered by this programmatic review, no trees greater than 4 inches in diameter can be removed within structure setbacks and buffers and tree removal is not allowed in critical areas and stream buffers k is limited to those areas where disturbance has already occurred in easements and is limited to access corridors in steep slope critical areas. No new permanent disturbance can be created and any temporary disturbance is required to be restored to pre-construction conditions.

In order to avoid impacts and any temporary disturbance from replacement of utility systems and facilities within streams, stream buffers, wetlands, and ponds the use of boring or drilling as the method for installation is required. Any boring entry and exit pits must also be located outside of any of these same areas. Entry/exit pits in buffers other than from streams and structure setbacks is allowed, provided temporary disturbance is

restored.

### **C. NOISE**

The project activities may occur adjacent to various land use zoning districts. Construction noise generated by activities covered under this programmatic SEPA is limited by the City's Noise Ordinance (Chapter 9.18 BCC) which regulates construction hours and noise levels. See Conditions of Approval in Section VI of this report.

## **V. CONCLUSION AND DECISION**

After conducting the various administrative reviews associated with this proposal, including Land Use Code consistency, City Code, SEPA, and Standard compliance reviews, the Director of the Development Services Department does hereby **approve with conditions** the programmatic review of public utility projects that exceed eight inches in diameter including new, repaired, or replaced utilities as described in this report. **This programmatic SEPA review does not constitute a permit for construction. A clearing and grading permit, right-of-way permit, utility permit, or other development permit, including a Critical Areas Land Use Permit or other Land Use approval may be required and all plans are subject to review for compliance with applicable City of Bellevue codes and standards.**

**Note - Expiration of Approval:** This programmatic SEPA approval is for projects proposed within a six year period, beginning on May 15, 2014 and ending May 15, 2020 or at such time as the SEPA rules or City Environmental Procedures Code are amended.

## **VI. CONDITIONS OF APPROVAL**

**The following conditions are imposed under the Bellevue City Code or SEPA authority referenced:**

- 1. Permit Required:** Issuance of this programmatic SEPA does not constitute an approval of a development permit. Application for all required permits must be submitted and approved. Plans submitted as part of a permit application shall be consistent with the activity included under this approval.

Authority: Land Use Code 20.30P.140

Reviewer: Reilly Pittman, Development Services Department

- 2. Programmatic SEPA Notification Form:** Land Use Staff will ensure Utility projects are appropriate for coverage by this programmatic review. The Utility project manager is required complete a notification form. A copy of the notification form can be found as Attachment 3. The form is intended to provide Development Services staff with the information necessary to ensure compliance with this programmatic SEPA review. It also serves as a tool for the applicant in determining if the scope of a particular project is within

the scope of the programmatic SEPA review. The notification form shall be filled out and submitted with the required clearing and grading permit application. A project may also be reviewed under the pre-development services review process prior to the submittal of any development permit application.

Authority: Land Use Code 20.25H.055, Bellevue City Code 23.02  
Reviewer: Reilly Pittman, Development Services Department

- 3. Tree Removal:** No trees can be removed within any stream, stream buffer, wetland, or steep slope critical areas. No tree greater than 4 inches in diameter can be removed within a buffer or setback, excluding stream buffers.

Authority: Land Use Code 20.25H.055  
Reviewer: Reilly Pittman, Development Services Department

- 4. Restoration of Temporary Disturbance:** Any areas of temporary disturbance within critical areas, buffers, or setbacks must be restored. Pre-construction condition must be documented with photos as part of the required permit application. Restoration must be shown on the submitted site plans for permits and can use the City's Critical Areas Handbook planting templates. Restoration plans must include the plant types, sizes, and spacing information to calculate density. Any restored areas must be maintained and monitored for at least 1 year.

Authority: Land Use Code 20.25H.055  
Reviewer: Reilly Pittman, Development Services Department

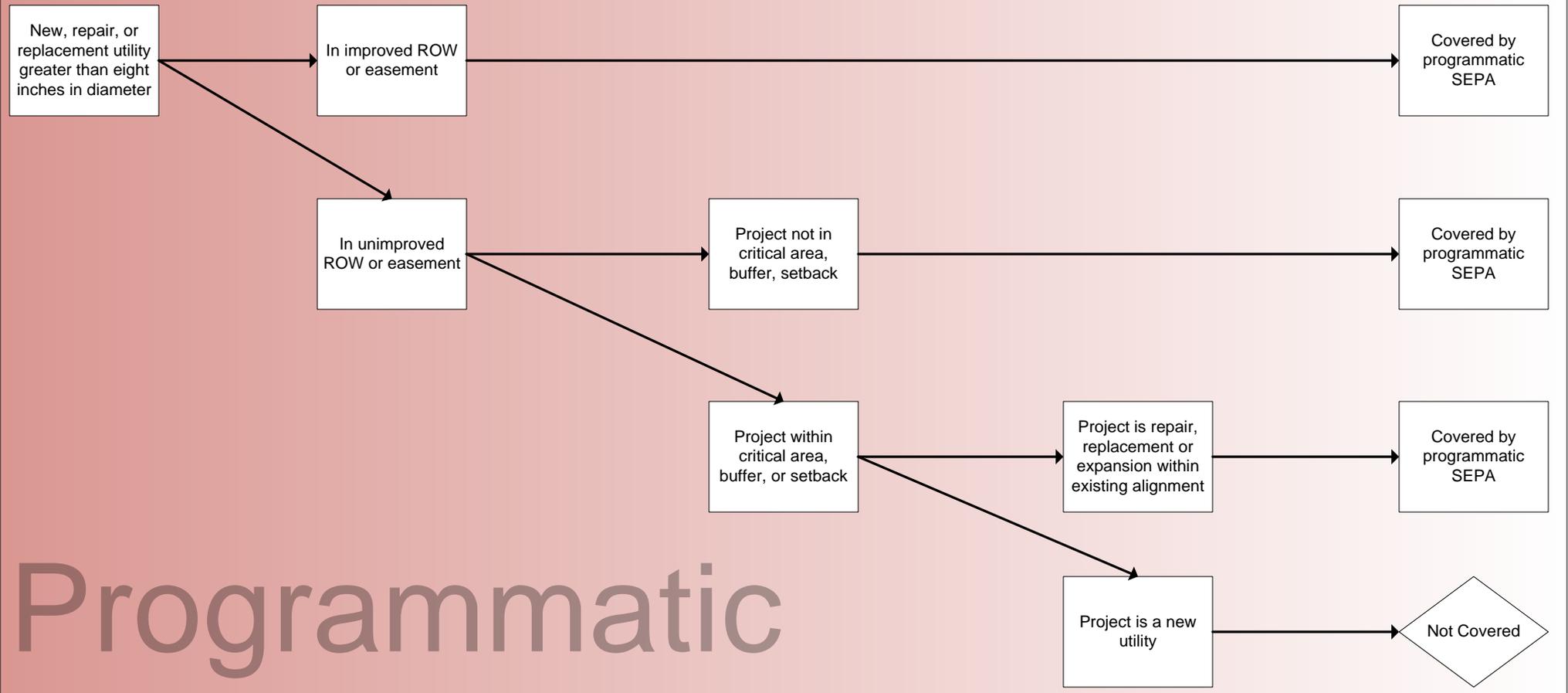
- 5. Noise Control:** Noise related to construction is exempt from the provisions of BCC 9.18 between the hours of 7 am to 6 pm Monday through Friday and 9 am to 6 pm on Saturdays, except for Federal holidays and as further defined by the Bellevue City Code. Noise emanating from construction is prohibited on Sundays or legal holidays unless expanded hours of operation are specifically authorized in advance. Requests for construction hour extension must be done in advance with submittal of a construction noise expanded exempt hours permit.

Authority: Bellevue City Code 9.18  
Reviewer: Reilly Pittman, Development Services Department

## Best Management Practices for Projects Using Utility Programmatic Approval

- No open streams can be placed into pipes or relocated
- When utilities cross under or over streams the utility must be located so that the culvert does not restrict the future replacement of a culvert for fish barrier removal. The depth of the utility above or below the culvert will be determined per Washington State Department Fish and Wildlife guidance on a case-by-case basis for larger streams
- All stockpiled material will be stored within easement, road prism, or taken off-site
- Work shall be consistent with all applicable City of Bellevue codes and standards: All permits required will be obtained by the Utilities Department prior to commencing work.
- Utilities within wetlands, streams, ponds, or stream buffers with native vegetation must be bored or drilled under the critical area; steep slopes forming stream buffers must also be bored or drilled
- Bore pits must be located outside critical area or stream buffer
- Any disturbed area, including legally established improved areas must be restored to pre-construction conditions. Disturbance in critical areas, buffers, or setbacks, excluding legally established improvements and landscaped areas must be restored with native plants that may use the City's planting templates in the Critical Areas Handbook. The area of disturbance must be restored prior to final inspections or within 30 days following work completion.
- Projects which will cause temporary disturbance within buffers or structure setbacks must photo document the area of disturbance (pre-construction) and note any areas on the plans as part of the development permit applications.
- Monitoring of restored areas is required for at least a 1-year period which may be extended depending upon the scale of restoration needed for a specific project.
- No trees in wetlands, streams, stream buffers, or steep slopes can be removed. No tree removal should be needed as utilities will be bored under wetland, streams, and their buffers and work on steep slopes will be within existing access roads and corridors. No tree larger than 4 inches in diameter can be removed within buffers or setbacks, excluding stream buffers.
- No new impervious surface is allowed within buffers or setbacks

# SEPA Exemption or Programmatic Coverage of Utilities in the Existing Public Right-of-Way or Public Easement



# Utility Programmatic SEPA Review

City of Bellevue Programmatic SEPA for Utilities Infrastructure – 14-126071-LM

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Any project that is covered under the programmatic SEPA for Utility Infrastructure in the Right-of-Way or public easement requires Land Use review of this form to insure the project scope is covered by the programmatic SEPA. This form should be submitted with the Clearing and Grading permit or sent to [landusereview@bellevuewa.gov](mailto:landusereview@bellevuewa.gov) if only a Right-of-Way permit is needed.

\_\_\_\_\_-\_\_\_\_\_

Please provide applicable Clearing and Grading or Right-of-Way permit number

Briefly describe the scope of work proposed.

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Please answer the following questions to determine if the project is covered by the programmatic SEPA.

1. Project is within existing City Right-of-Way or Public Easement?  No  Yes  
If no, the project is not eligible for coverage under the programmatic SEPA.
2. Project is new, repair, or replacement greater than 8 inches in diameter?  No  Yes  
If no, the project may already be exempt from SEPA and not covered by the programmatic SEPA.
3. Project is within improved or unimproved right of way or easement?  Improved  Unimproved  
If improved, the project is covered by the programmatic SEPA. If unimproved, proceed to #4.
4. If unimproved, is the project in a critical area, buffer, or setback?  No  Yes  
If no, the project is covered by the programmatic SEPA. If yes, proceed to #5.

5. If yes, is the project constructing a new utility or new alignment?

No

Yes

If no, the project is covered by the programmatic SEPA.

If yes, the project is a new utility or within a new alignment and the project requires separate SEPA review with the associated permit.

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**DECISION BY LAND USE** *(to be filled out by LU review staff)*

Based on the answers above:

The project is covered by the programmatic SEPA

No

Yes

\_\_\_\_\_  
Land Use Reviewer

\_\_\_\_\_  
Date